

Handwritten: Lubrizol

Certified Return Receipt



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THE LUBRIZOL CORPORATION
P.O. BOX 158
41 TIDAL ROAD
DEER PARK, TX 77536-0158
TELEPHONE: 713/479-2851

August 1, 2000

NWM-018-2000

Texas Natural Resource Conservation Commission
Region 12
Attn: Elizabeth W. Sears
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

Re: Site Wastewater Inspection
Deer Park Facility TPDES Permit No 00639

Dear Ms. Sears;

Lubrizol has received your letter dated July 17, 2000 concerning a Notice of Violation for the Compliance Review Inspection on May 25, 2000. Contained within this letter are two items that have previously been corrected and addressed with written notification to Ms. Barbara Sullivan and as stated in your letter. Additionally, there is one item requiring immediate response.

During the split sampling of Lubrizol's Outfall 001, TNRCC analyzed the BOD₅ as 29 mg/L. This is an alleged violation of our permit limit of 20 mg/L. I have spoken with Ms. Sullivan concerning this sample and was made aware that Lubrizol's sample was collected just after the TNRCC sample was collected and was not a true split of the sample. Lubrizol analyzed our sample and the BOD₅ reading was 18 mg/L, which is in compliance with our discharge permit. I am unaware of any conditions that would indicate why these two samples would disagree other than one of our clarifiers was down for maintenance at the time of the sampling event and that the sample was not a true split. Both clarifiers were placed back in operation the following day, 5/26/2000.

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The BOD₅ grab limit contained within Lubrizol's TPDES permit has been noted and is being addressed in our permit renewal and major amendment application submitted in 4/1998. The limit was found to be set in error at a level that lies between the calculated mg/L BOD₅ mass based limits of our permit. Please find Page 1 of the Industrial Wastewater Permit Application Technical Report for our amended renewal which states the issue that I am noting within this response.

Lubrizol wishes to thank the TNRCC and you for the opportunity to respond and correct these deficiencies within our regulatory compliance system. Lubrizol regrets any inconvenience these deficiencies may have caused and the company remains committed to making every reasonable effort to assure compliance with the TNRCC water discharge permit requirements. Should you have any further questions, please contact me at (281) 479-2851.

Sincerely yours,
THE LUBRIZOL CORPORATION

A handwritten signature in black ink, appearing to read "Norman W. Mollard III", with a stylized flourish at the end.

Norman W. Mollard III
Environmental Engineer
Water Affairs

NWM/nwm
Enclosure